

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**In Re:** **Robert J. Titus** : **Chapter 13**  
**Helena M. Titus** :  
**Debtors** : **Bankruptcy No. 19-17728-AMC**  
: :  
: **Motion to Allow Debtor to Proceed With A**  
: **Trial Period Plan and Loan Modification**

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**CERTIFICATION OF NO RESPONSE**

I, Jeffery A. Fournier, Esquire, attorney for Debtors, hereby certifies the following:

1. That a Motion to Allow Debtor to Proceed with a Trial Period Plan and Loan Modification was filed on December 18, 2019.
2. Notice was served upon all creditors and interested parties on or about December 18, 2019.
3. More than twenty (20) days have lapsed and there has been no response by creditors or interested parties.

**WHEREFORE**, Debtors/Movants respectfully request that the Motion to Allow Debtors to Proceed with the Trial Period Plan and Loan Modification be approved.

/s/ Jeffery A. Fournier, Esquire  
Jeffery A. Fournier, Esquire  
Attorney for Debtors